

The Honorable Edward F. Shea

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

SARAH BRADBURN, PEARL
CHERRINGTON, CHARLES HEINLEN
and the SECOND AMENDMENT
FOUNDATION,

Plaintiffs,

v.

NORTH CENTRAL REGIONAL LIBRARY
DISTRICT,

Defendant.

No. CV-06-327-EFS

**PLAINTIFFS' FIRST SUPPLEMENT
TO INITIAL DISCLOSURES
PURSUANT TO FED.R.CIV.P.
26(a)(1) AND (e)(1)**

TO: The NORTH CENTRAL REGIONAL LIBRARY DISTRICT;

AND TO: THOMAS D. ADAMS and CELESTE M. MONROE of KARR TUTTLE
CAMPBELL, attorneys of record for the North Central Regional Library
District.

Plaintiff hereby supplements its initial disclosures pursuant to Fed.R.Civ.P. 26(a)(1)
and (e)(1).

(A) The name and, if known, the address and telephone number of each individual
likely to have discoverable information that Plaintiffs may use to support their claims or
defenses, unless solely for impeachment, identifying the subjects of the information:



1 Kenton L. Oliver
 2 Executive Director
 3 Stark County District Library
 4 715 Market Avenue N.
 Canton, OH 44702
 330-452-0665

5 Mr. Oliver is a librarian, and serves as the Executive Director of the Stark County
 6 District Library ("SCDL"), headquartered in Canton Ohio. He also chairs the American
 7 Library Association's Intellectual Freedom Committee. The SCDL's Internet policy can be
 8 viewed at <http://www.starklibrary.org/uploads/InternetandComputerUsePolicy-801.pdf>, and
 9 its Internet procedures can be viewed at <http://www.starklibrary.org/uploads/InternetProceduresFinal200503-802.pdf>. By default, Internet access at the SCDL is filtered.
 10
 11 However, any person over the age of 16 wishing to bypass the filter and access blocked Web
 12 sites may do so by entering his or her library card number. The SCDL's staff will also disable
 13 the library's filter at the request of an adult who does not have an SCDL library card. With
 14 their parents' permission, children under 16 may obtain library cards allowing them to bypass
 15 the filter. Mr. Oliver is a fact witness who is expected to testify primarily about the SCDL's
 16 policies, procedures and experiences with regard to Internet filters. He has information
 17 regarding alternatives to refusing to disable Internet filters at the request of adult library
 18 patrons; the SCDL's Internet policies and procedures; how the SCDL's computer terminals
 19 and filter have been configured; how the SCDL's policies and procedures have been
 20 implemented; his experience working with Internet policies, procedures and filters; and the
 21 consequences, if any, of allowing patrons of the SCDL to bypass the library's Internet filter.

22 Sally Beesley
 23 Director, Jefferson County Library District
 241 Southeast 7th Street
 Madras, OR 97741
 541-475-4678

25 Ms. Beesley is a librarian, and serves as the Director of the Jefferson County Library
 26 District ("JCLD") in Madras, Oregon. The JCLD's Internet policy can be viewed at



1 <http://www.jcld.org/PDF-files/Netpolicy.pdf>. Internet access at the JCLD is unfiltered. The
 2 JCLD does not receive e-rate discounts or LSTA funding. Ms. Beesley is a fact witness who
 3 is expected to testify primarily about the JCLD's policies, procedures and experiences with
 4 regard to Internet filters. She has information regarding alternatives to refusing to disable
 5 Internet filters at the request of adult library patrons; the JCLD's Internet policies and
 6 procedures; how the JCLD's computer terminals have been configured; how the JCLD's
 7 Internet policies and procedures have been implemented; her experience working with Internet
 8 policies, procedures and filters; and the consequences, if any, of providing unfiltered Internet
 9 access at the JCLD's computers.

10 DATED this 10th day of September, 2007.

11 RAFEL MANVILLE PLLC

12
 13 By 

14 Duncan Manville, WSBA #30304

15 Robert A. Hyde, WSBA #33593

16 Attorneys for Plaintiffs Sarah Bradburn, Pearl
 17 Cherrington, Charles Heinlen and the Second
 18 Amendment Foundation
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